

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

OMAR HURLOCK, on behalf of himself and all  
others similarly situated,

Plaintiff,

v.

KELSIER VENTURES et al,

Defendants.

Case No.: 25 CV 03891 (JLR)

**Motion to Withdraw As Counsel**

I move to withdraw as counsel in this matter with the consent of client, Omar Hurlock. In accordance with Local Civil Rule 1.4, withdrawing counsel hereby asserts and preserves an attorney's charging lien under N.Y. Judiciary Law § 475 on any settlement, judgment, or other monetary recovery obtained for the Plaintiff and or/or the putative class in this action, for the quantum meruit value of the firm's services and reimbursable costs. The firm will seek an award at the appropriate time under Fed. R. Civ. P. 23(h) and/or 54(d)(2).

DATED: June 28, 2025

Respectfully submitted,

/s/Timothy J. Treanor

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*Attorney for Plaintiff*